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NEGATIVE DECLARATION

Department of Toxic Substances Control
Standardized Permitting and Corrective Action Branch
8800 Cal Center Drive
Sacramento, CA 95826

Subject: ☐ DRAFT ☒ FINAL ☐ MITIGATED

Project Title: McCormick Selph Incorporated Hazardous Waste Facility Permit Renewal

State Clearinghouse No.: 2006021137

Project Location: 3601 Union Road, Hollister, California 95023

County: San Benito

Project Description:

The Department of Toxic Substances Control (DTSC) is renewing a Hazardous Waste Facility Permit (Permit) for McCormick Selph, Incorporated, (MSI) in accordance with California Health and Safety Code, division 20, chapter 7.5, section 25200 and the California Code of Regulations, title 22, division 4.5. The MSI facility (Facility) would be reauthorized to perform hazardous waste management activities under a Resource Conservation and Recovery Act (RCRA) equivalent Permit as more fully described below. MSI's hazardous waste management activities are fully described in the "Facilities Hazardous Waste Operations Plan," (FHWOP) dated January 4, 2006, which contains the Part "A" and Part "B" Permit Applications. The Facility was previously owned and operated by Teledyne, Incorporated in accordance with an Interim Status Document issued on April 6, 1981, and a Hazardous Waste Facility Permit issued on November 7, 1983; and by Teledyne Ryan Aeronautical in accordance with a Permit issued on July 28, 1993. Effective July 16, 1999, the permitted owner/operator was changed from Teledyne Ryan Aeronautical to MSI. MSI is a wholly-owned subsidiary of Pacific Scientific Energetic Materials Company, Hollister Division, LLC, an indirect subsidiary of Danaher Corporation.

Facility Location:

The MSI Facility is located approximately 3 miles southwest of Hollister, California at 3601 Union Road, near the intersection of Union Road and Highway 156. The Facility is a 290-acre property. The property is described by the following San Benito County Assessor's parcel numbers: 021-140-001 and 021-140-048. The Facility is zoned for light industrial use (M1). All properties adjoining the Facility are zoned for agricultural use.

Facility Background/History:

The Union Road facility was built in 1971 by Teledyne, Incorporated, (Teledyne) which purchased McCormick Selph Associates in 1964. Teledyne filed a Part A Application on November 19, 1980, and was issued an Interim Status Document (ISD) for hazardous waste treatment and storage on April 6, 1981. A Permit to store hazardous waste in tanks and containers was issued on November 7, 1983. Other hazardous waste activities such as treatment in tanks, storage and treatment in surface impoundments, and thermal treatment of explosive wastes continued under the ISD. In 1993, McCormick Selph was realigned with Ryan Aeronautical and became Teledyne Ryan Aeronautical/McCormick Selph Ordnance (Teledyne Ryan). On July 28, 1993, a Hazardous Waste Facility Permit was issued to Teledyne Ryan to operate the following hazardous waste management units:

1. A pit for detonation of solid reactive waste (Part of TSU-1, closed June 13, 2000)
2. One unit for open burning of solid reactive waste (TSU-1)
3. One unit for burning of solvents contaminated with reactive wastes (TSU-2)
4. Two water evaporation units (TSU-7, closed October 26, 2001, and TSU-8)
5. One silver recovery reactor (TSU-6, closed October 4, 2000)
6. A waste photographic silver recovery unit (TSU-10, no longer regulated, effective January 1, 1999)
7. A treatment reactor (TSU-9, closed, pending DTSC certification)
8. Three aboveground hazardous waste storage tanks (TSU-4, closed, pending DTSC certification)
9. One hazardous Waste container storage area with four bays (TSU-3)
10. Treatment of two-part epoxy compounds by mixing them in containers.

In July 1999, MSI became part of J. F. Lehman and Company as MSI. In July 2003, MSI was acquired by Pacific Scientific Energetic Materials Company. Although the Permit issued on July 28, 1993, expired on July 31, 2003, it continued to be in effect while DTSC processed the FHWOP for renewal of the Permit. As listed above, several of the former hazardous waste management units have closed since the 1993 Permit was issued. The units continuing to operate under the new Permit are TSU-1, TSU-2, TSU-3, TSU-8, and treatment of two-part epoxy compounds in containers (at TSU-3, Bay D).

Facility Operations:

MSI and predecessor companies have manufactured explosives and explosive devices for aerospace, military, and commercial applications and produced specialty chemicals on a contract basis at the Facility since 1971. Hazardous waste generated from these activities include: solvents, toxic chemicals, metal powders, reactive compounds, explosives, flammable liquids, and corrosive solids and liquids. Hazardous wastes generated at the Facility are either treated at the Facility or sent to an approved off-site treatment or disposal site. MSI does not accept at the Facility any hazardous wastes generated at off-site locations. The following hazardous waste management activities at the Facility are governed by the Hazardous Waste Facility Permit: open burning/open detonation of reactive (explosive) materials at TSU-1, open burning of organic liquids (solvents) containing explosives at TSU-2, storage of containers of hazardous waste for up to one year at TSU-3, volume reduction of explosives contaminated water by evaporation in open tanks at TSU-8, and mixing two part epoxy compounds in containers at TSU-3, Bay D.

Hazardous Wastes:

Detailed information on the hazardous waste managed by the Facility can be found in Chapter III of the approved FHWOP. The FHWOP lists in Table III-1, 100 wastes that are stored in containers or treated in other units at the Facility. All hazardous wastes are generated on-site. No hazardous wastes are accepted from off-site sources. The Facility handles the following hazardous waste materials types:

1. Ordnance parts and scrap
2. Explosive/reactive raw materials and residues
3. Solvent and solvent/water mixtures containing explosive waste particles
4. Caustic solids and liquid solutions
5. Cyanide-containing solids and liquid solutions
6. Sulfide-containing solids and liquid solutions
7. Halogenated hydrocarbons
8. Toxic solids and aqueous solutions
9. Acids
10. Flammable and combustible liquids and fuels
11. Reducing agents
12. Metal catalysts
13. Carbon
14. Water containing explosive waste particles (Safety Bucket Water)
15. Two-part epoxy compounds (paints, potting compounds, adhesives, and insulating materials)

Waste Stream Characterization:

Almost all of the hazardous waste generated at MSI is from production processes where the constituents and concentrations are known. Information comes from material safety data sheets (MSDSs), production plans, standard operating procedures, and other production guidance documents. When wastes require analysis to determine their characteristics, a sampling and analysis plan is developed, as described in Chapter III of the FHWOP, which will determine if the waste is hazardous, along with other qualities which must be known to properly ship and/or dispose of the waste. Off-site laboratories, certified by the State of California, are used for waste characterization analyses.

TSU-1:

TSU-1 is the open burn/open detonation unit and is located in the southern portion of the Facility. TSU-1 contains two 10-foot diameter, reinforced concrete pipes (burn tubes) which are enclosed in a reinforced, expanded metal mesh cage (22 feet wide x 28 feet deep x 10 feet, 10 inches high). The mesh cage is surrounded by a concrete wall, installed in 2002, and on three sides by an earth bank and earth barricades over 15 feet high. The pipes rest on a six-inch thick concrete slab reinforced with steel bars. The cage is bolted to the concrete slab and structurally supported by cantilever supports attached to external foundation blocks. The dimensions of the concrete slab are 54 feet wide by 50 feet deep. There is a 66-foot by 62-foot, corrugated metal roof structure over the mesh cage and concrete slab.

Explosive hazardous waste (EHW) and EHW contaminated waste is burned/detonated at TSU-1. Subsequent secondary and tertiary burning is conducted as needed to ensure complete treatment of the reactive materials. Over 95% of the EHW treated at TSU-1 is contained in explosive devices made of metal. The Explosive Hazardous Waste in Solvents (EHWS) residue from TSU-2 makes up about 5% of the waste treated at TSU-1. Prior to treatment, EHW and EHW contaminated wastes are stored in secure locations in accordance with State, Bureau of Alcohol, Tobacco, and Firearms (BATF), and Department of Defense (DOD) requirements. The maximum capacity of TSU-1 is 500 pounds gross weight of hazardous waste per day for open burning and 100 pounds Net Explosive Weight (NEW) per day for detonation. Not over six pounds NEW of material, which is expected to mass detonate, is allowed in each burn tube. Ash generation is limited to the cellulose fuel used, to small amounts from EHW contaminated organic material, and to loose EHW in the form of granules, pellets, or billets. Ash from TSU-1 with lead content is collected and managed as hazardous waste through TSU-3. Other ash from TSU-1 is managed as non-hazardous waste, as is scrap metal.

TSU-2:

TSU-2 is an open burning unit for solvent wastes containing explosives. TSU-2 is located in the central portion of the Facility, south of Lake Teledyne and west of TSU-8. TSU-2 consists of four sets of open, horizontal steel troughs supported by steel racks in a double boiler arrangement. The troughs are made from 55-gallon carbon or stainless steel drums cut on the height axis to have a volume for 30 gallons of fluid and a five-inch freeboard. Two racks with eight troughs rest in a stainless steel secondary containment pan. There are two secondary containment pans. One is four feet by ten feet and 0.489 feet deep (146 gallons). The other secondary containment pan is 4.98 feet by ten feet and 0.489 feet deep (183 gallons).

Contaminated solvents containing relatively more water or lower volatility are placed in the upper containers. The fire is initiated remotely in the lower container. EHWS is not placed into the unit until just before burning is started. The treatment capacity is 300 gallons per day. The maximum volume of fluid in each trough is 30 gallons. Treatment is not done during periods of expected rain. Between treatments, the upper troughs contain less than five gallons of material with free liquid and the lower troughs contain dry ash. If not empty, the troughs are covered. If empty, the troughs and secondary containment pans are removed or inverted during expected periods of rain. Residue from TSU-2 is treated in TSU-1 to ensure complete treatment of its reactivity.

TSU-3:

TSU-3 is the container storage unit and is located in the central portion of the Facility, southeast of Lake Teledyne. TSU-3 has a 6-inch thick reinforced concrete slab surrounded on three sides by a concrete block berm. TSU-3 is fully covered by a roofed building with open sides. The un-bermed front side of TSU-3 has individual grated sumps for each of the four Bays, which prevent run-on and collect spills and any rain which may blow into the Bays. The Bays are separated from each other by reinforced concrete dikes, which are bolted and epoxy bonded to the coated concrete floor of the Bay. The inside dimensions of Bay A and Bay D are each 17 feet, 3 inches wide by 59 feet, 3 inches long. The inside dimensions of Bay D and Bay C are each 16 feet, 6 inches wide by 59 feet, 3 inches long. The volume of each of the sumps for Bay A and Bay D is 1,077 gallons and for Bay B and Bay C is 1,025 gallons. Bay A is the southern-most of the four Bays. Different waste types are allowed in each of the Bays to prevent potential reactions between incompatible wastes in the event of a spill. The waste types allowed in Bay A are caustics, cyanides, sulfides, and aqueous solutions with pH of 5 to 9. The waste types allowed in Bay B are halogenated hydrocarbons, non-flammable liquids, and aqueous solutions with pH of 5 to 9. The waste type allowed in Bay C is acids. The waste types allowed in Bay D are flammable liquids, reducing agents, metal catalysts, carbon, fuels, and combustible liquids. A variety of types and sizes of containers may be used for storage of hazardous waste at TSU-3. Containers of hazardous waste may not be stored at the Facility for longer than one year. Containers on pallets may be stacked two pallets high. The maximum capacity for each Bay is 192 55-gallon drums. Based on the capacity of the secondary containment, the maximum quantity of liquid wastes and wastes containing free liquids is 4,140 gallons or 75 55-gallon drums for Bay A, 3,650 gallons or 66 55-gallon drums for Bay B, 3,330 gallons or 60 55-gallon drums for Bay C, and 3,100 gallons or 56 55-gallon drums for Bay D. Air pollutant emissions from containers are controlled by keeping the containers closed, except when material is added or removed from the container.

TSU-8:

TSU-8 treats water containing particles of explosives (Safety Bucket Water) by natural evaporation. TSU-8 is located in the central portion of the Facility, south of Lake Teledyne and east of TSU-2. TSU-8 consists of two evaporation troughs within a concrete secondary containment pad filled by gravity feed pipes from an unloading area. Safety Bucket Water is siphoned or hand-pumped from a container in an environmental support vehicle into the feed pipes in the unloading area, which empty into the evaporation troughs. The feed pipes are pipe-in-pipe construction with a 2-inch diameter stainless steel inner pipe and a 4-inch diameter polyvinyl chloride (PVC) outer pipe. The troughs are constructed of three-

sixteenths of an inch thick carbon steel with welded heads. The troughs are coated with a 100% solids coal tar polyurethane elastomer coating to a minimum thickness of 100 mils (equals one tenth of an inch). The troughs are half cylinders with slightly domed ends. Each trough is approximately 4.32 feet in diameter and 11.3 feet long. The maximum capacity of each treatment trough, with an operational freeboard of six inches, is approximately 505 gallons. The treatment capacity is approximately 1,100 gallons per year, based on an observed average evaporation rate of three gallons per day. When enough water has evaporated to result in a thick turbidity, the concentrated hazardous waste is transferred to TSU-1 or TSU-2, added to other EHWS and burned. No volatile organic compounds are present in the Safety Bucket Water.

Treatment of Two-Part Epoxy Compounds:

Solidification of two-part epoxy compounds in containers is conducted at TSU-3, Bay D. Two-part epoxy paints, potting compounds, adhesives, and insulating materials are mixed according to the manufacturer's specifications in either the original containers or in one-gallon, open steel cans. Open quantities of these materials at manufacturing work stations greater than one liter and larger quantities in unopened containers become excess to production needs through expiration of shelf life and when inspection reveals the material to be off-specification. These materials are accumulated and transported to TSU-3, Bay D for storage and treatment by mixing and solidification. The solidified materials may be disposed of off-site as non-hazardous solid waste. The process capacity listed in the FHWOP is 20 gallons per day.

On-Site Waste Transport:

Two to three trucks, typically one-half to one and one-half ton pickup trucks or vans are dedicated to hazardous waste management activities and/or assigned to MSI Support Services. These MSI owned trucks and vans are used for occasional on-site hazardous waste hauling. All vehicles used for on-site waste management are equipped with fire extinguishers, hazard placard signs, two-way radios, a first aid kit, and seat belts.

Off-Site Waste Transport:

At this time, no MSI vehicles are registered with the State of California for hauling hazardous waste off-site.

Facility Security:

The Facility property is surrounded by a three-strand barbed wire grazing fence. The main 100-acre industrial site is contained within an eight-foot chain link security fence that is topped with three strands of barbed wire canted outward. Six service gates in the security fence are locked except when in use. An additional grazing fence surrounds TSU-1 and the containment device for explosives burning is within a steel frame security cage. The cage is locked at all times when not attended by MSI employees. Signs with hazardous waste area warning text in English and Spanish are posted at approximately 100-yard intervals on the outer grazing fence, the security fence, and on each approach to the perimeter of each hazardous waste management unit. Security Central, located at the only entrance to the MSI property, controls all resource protection activity. A seven day, 24 hour patrol maintains surveillance of all structures and grounds on a planned irregular schedule, in combined vehicle and foot patrols. Each hazardous waste management unit is observed by the patrol at least once every 24 hours.

Facility Safety and Emergency Equipment:

All hazardous waste management units, except TSU-1, are served by a high-pressure, underground fire suppression water distribution system with a fire hydrant near each unit. The system is supplied from Lake Teledyne, which contains several million gallons of water for fire suppression and spill cleanup. A 6,000-gallon per minute automatic pump with an electric motor pumps water to the distribution system. Over 150 portable fire extinguishers are installed in readily assessable locations throughout the Facility, including at least one extinguisher at or near each hazardous waste management unit and in all MSI industrial vehicles. The hazardous waste management units are supported by nearby installed eye wash/shower units. Two gasoline powered portable generators and two 1,000-watt portable light stands are available for emergency lighting in support of hazardous waste operations. Radio communication between Security Central and patrols is maintained through use of a base station with remote repeater and hand-held and/or mobile radios. Environmental technicians are assigned hand held radios.

Emergency Contingency Plan:

The MSI Hazardous Materials Emergency Business Operations Plan, Chapter VIII of the FHWOP, is coordinated through, and acknowledged in writing by, all off-site, first responder organizations, the San Benito County Office of Emergency Services, and Hazel Hawkins Hospital in Hollister, California. This Plan directs emergency actions required to mitigate the effects of potential disasters: such as, earthquakes, structural and wild land fires, accidental detonations, accidental spills

or release of hazardous materials, including hazardous waste, or employee injuries. The Plan is designed to support the State of California Emergency Plan and the Standardized Emergency Management System (SEMS) to include the Incident Command System. Any spill or release of materials that has the potential to cause injury to people, the environment, or property is considered an initiating event for the Plan if it cannot be completely and immediately contained and neutralized by the people on the scene using the equipment on the scene at the time of the spill.

Facility Inspections:

Inspections of hazardous waste management units are conducted in accordance with a MSI Standard Operating Procedure, which is Attachment VI-4 of the FHWOP. The units are inspected a minimum of once a week by an Environmental Technician and the security patrol observes each unit every day for abnormalities. Emergency equipment located at the units is inspected monthly or after each use.

Facility Closure Plan:

The Closure Plan, Chapter IX of the FHWOP, identifies the steps necessary to close the hazardous waste management units, either individually (partial closure) or the entire Facility at the end of its operating life. The intent is to close each unit and the Facility in a way that will not require post-closure maintenance, care, and/or monitoring to protect human health and the environment from escape of hazardous waste, hazardous constituents, contaminated run-off, or decomposition products to ground or surface water, or the atmosphere. The general steps required for each unit are treating or removing waste inventory, cleaning or decontamination of equipment and unit structures, sampling and testing of surrounding soils, and removal of any contaminated equipment, structures, or soil and any closure-generated wastes. In general, the closure performance standards are either: a) "non-detect" concentrations of hazardous constituents, b) "background" concentrations for naturally occurring constituents (e.g., metals), or c) health-risk based concentrations based on potential future residential or unrestricted use of the property. Other health-risk based standards (e.g., for future industrial use or other restricted uses of the property) may also be considered. Where restricted use standards for closure are ultimately used, a land use covenant must also be developed and attached to the property deed.

Financial Responsibility for Closure:

MSI has obtained an Environmental Closure and Liability Insurance policy in order to assure financial responsibility for closure of the hazardous waste management units at the Facility. The closure cost estimate for the entire Facility is $560,500 ($2004).

Site Remediation/Corrective Action Activities:

A RCRA Facility Investigation (RFI) of the vadose zone soil at TSU-1 was conducted between July 1995 and January 1996. Surface and subsurface soil samples were collected at TSU-1 and at the former detonation pit at TSU-1. Lead concentrations ranged from 4.4 to 15,000 mg/kg in surface soils. Samples collected at 1.5 feet below ground surface (bgs) had lead concentration of 4.4 to 17 mg/kg. Non-native surface soil samples collected in the detonation pit had lead concentrations up to 1,100 mg/kg. Lead concentrations in the native soils beneath the detonation pit (at 5 feet bgs) ranged from 6.4 to 14 mg/kg. A site specific cleanup goal for lead of 5,285 milligrams per kilogram (mg/kg) was established in the human health risk assessment and approved by DTSC. Soil from an area approximately 60 feet by 40 feet and 1.5 feet deep was removed for off site disposal at an authorized facility. Verification soil samples were collected and where the sample results were less than 5,285 mg/kg, the excavation was backfilled with fill approved by DTSC. The soil monitoring and removal operations began in spring 1998 and were completed during summer 1998.

In an effort to reduce the potential for future releases to the environment, the structural design of the TSU-1 unit was modified in the following ways: 1) extended the concrete slab from 24 feet by 30 feet to 54 feet by 50 feet; 2) improved the entrance by installing a 15 feet by 25 feet concrete apron with a loading dock and entry gate; 3) installed concrete perimeter walls on all four sides of the burn unit; 4) installed a 24 foot high roof covering the entire structure with an area of 66 feet by 62 feet; and, 5) performed grading as required to construct concrete pad and roof.

Soil verification sampling is required to be conducted by May 1 of each year in accordance with the "Corrective Measures Study Final Report for Lead Affected Soil, RCRA Unit TSU-1," July 7, 1998. The area to be monitored included soil located in areas not covered by the new TSU-1 modified structure. The area was established based on the "foot print" where lead concentrations exceeding the cleanup goal were found prior to excavation and an area adjacent to TSU-1 that did not have lead concentrations above the cleanup goal. MSI submits a report of the annual verification sampling to DTSC each year within 45 days after the soil sample collection. Verification sampling has occurred each year since 1999 and was most recently reported on June 3, 2005. With the modified structure and annual monitoring, the continued operation of TSU-1 should not have an adverse impact on the surrounding soils.

For the first time since verification sampling started, in 2005 a sample result had a lead concentration (11,000 mg/kg) which exceeded the clean-up goal of 5,285 mg/kg. As required, follow-up sampling was conducted on August 1, 2005, at the original sample location and at three additional locations within two feet of the original location. The four follow-up samples all had lead concentrations significantly lower than the clean-up goal. Based on the follow-up samples, the sample result of 11,000 mg/kg for lead is considered an anomalous result that does not represent the average lead concentration in soil in the vicinity of TSU-1. No additional remedial activities related to TSU-1 are required until the next annual verification sampling event.

Groundwater Corrective Action:

Groundwater and soil investigations starting in May 1999 have identified groundwater contamination by volatile organic compounds (VOCs) and perchlorate at several locations at the MSI Facility. The sources of the contaminants have not been identified, but the sources are not the operating TSUs that are in the Permit. The larger contaminant plume is in the alluvial deposits east of Lake Teledyne in the vicinity of the TSU-3/Thermal Destruct Facility area. A "Corrective Action Plan, Soil and Groundwater Investigation (CAP)" was submitted to the Regional Water Quality Control Board (RWQCB), Central Coast Region, on December 12, 2002. The CAP identified a combination of monitored natural attenuation and enhanced in-situ bioremediation as the most technically feasible and cost-effective remedial approach to address the presence of VOCs and perchlorate in groundwater at the Facility. The CAP was approved by the RWQCB on February 13, 2003. The "Enhanced In-Situ Bioremediation Pilot Study Workplan (EISB Workplan)" was submitted on September 4, 2003, and approved by the RWQCB on October 15, 2003, with modifications.

Components of the EISB program included: 1) a pre-injection groundwater monitoring event; 2) the pilot-scale injection of Hydrogen Release Compound (HRC); 3) post-injection groundwater monitoring; and 4) preparation and implementation of a full-scale EISB Workplan. The pre-injection groundwater monitoring event and pilot-scale injection of HRC were performed in November and December 2003. Quarterly post-injection groundwater monitoring has been performed since then. The "Groundwater Monitoring Report, Second Quarter 2005," documenting the sixth and final pilot-scale post-injection monitoring event, was submitted on July 28, 2005.

Two primary regions that were being tracked were the a) Source Treatment Pilot Study Area and b) Downgradient Barrier Pilot Study Area. In the Source Treatment Pilot Study Area the results were that: a) reducing conditions have developed and biodegradation of perchlorate is occurring within both the finer-grained upper and coarser-grained lower portions of the alluvial deposits, 2) sulfate concentrations have decreased in the upper portion of the alluvial deposits, 3) total alkalinity has increased in both upper and lower portions, 4) Oxidation-reduction potential (ORP) measurements have declined in both lower and upper portions, and 5) perchlorate concentrations have decreased dramatically in both upper and lower portions of the alluvial deposits. In the Downgradient Barrier Pilot Study Area, similar results were found in one monitoring well. However, at the other groundwater monitoring well perchlorate and nitrate concentrations that had previously declined rebounded to levels comparable to the baseline conditions. Other geochemical parameters indicative of reducing conditions and perchlorate biodegradation continued to exist. Additional evaluation of this well will be part of the full-scale EISB Workplan. A full-scale EISB Workplan has been submitted to the RWQCB and is under review.

The hazardous waste management units are equipped with secondary containment systems to prevent spills or leaks from impacting soil or groundwater. Except for TSU-1, none of the hazardous waste management units in this Permit have had releases to soil or groundwater. TSU-1 was modified to reduce the potential for material to be ejected from the unit during open detonation events, and there is annual soil sampling to confirm that releases are not occurring. There has been a series of soil and groundwater investigations to determine the source areas and extent of perchlorate and VOC contamination in groundwater at the site. Although the sources of the contaminants in groundwater have not been identified, they are not the operating TSUs authorized by the Permit. The former operator of the Facility is conducting groundwater cleanup activities under the oversight of the RWQCB.

Finding Of Significant Effect On Environment: *(An Initial Study supporting this finding is attached.)*

On the basis of the information presented in the attached Initial Study, I find that the proposed project will not have a significant effect on the environment.

Mitigation Measures:

DTSC has determined that no additional mitigation measures would be required beyond those incorporated as part of the project to ensure that impacts would be less than significant.

Branch Chief Signature		May 12. 2006 Date
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